

DOCKET NO: UWY CV15-6025912-S : SUPERIOR COURT
JAMES GRECHIKA : J.D. OF WATERBURY
VS. : AT WATERBURY
WHOLE FOODS MARKET GROUP, ET AL : JUNE 30, 2016

PLAINTIFF'S TRIAL MANAGEMENT CONFERENCE REPORT

1. CASE DESCRIPTION:

This is a personal injury action stemming from a trip and fall accident that occurred on October 4, 2013 at 400 East Johnson Avenue in Cheshire, Connecticut. The plaintiff, James Grechika was lawfully walking on the subject premises, on the exterior brick paver stone walkway when he was caused to fall due to a broken and/or uneven surface on the exterior front walkway area

2. DISPUTED ISSUES:

Liability, causation and damages are in dispute.

3. ANTICIPATED WITNESSES:

PARTIES

1. James Grechika
2. Whole Foods Market Group, Inc.
3. WFM Properties Cheshire, LLC (pending motion to cite in)

FACT WITNESSES

4. James Grechika
5. Sandra Grechika
6. James D. Doyle, Jr.
7. A representative from Whole Foods Market Group, LLC
8. A representative from WFM Properties Cheshire, LLC

EXPERTS

9. Waterbury Hospital Personnel

10. Richard Manzo, M.D.
11. Hand To Shoulder Center Personnel
12. Naugatuck Valley Surgical Center Personnel
13. St. Mary's Hospital Personnel

***The plaintiff reserves the right to amend this list as necessary and to call all witnesses disclosed by the defendant.**

4. LIST OF PENDING/ANTICIPATED MOTIONS:

Motion to cite in WFM Properties Cheshire, LLC. – Dated June 29, 2016 (126.00). The plaintiff anticipates filing a Motion in Limine.

The plaintiff reserves the right to file additional motions as is deemed necessary.

5. LIST OF OPERATIVE PLEADINGS

1. Complaint dated December 17, 2014
2. Answer and Special Defenses 110.00
3. Claim for July of 6 112.00
4. Reply to Special Defenses 113.00
5. Certificated of Closed Pleadings 114.00
6. Plaintiff's Disclosure of Experts 117.00
7. Answer and/or Objections to request for Admissions 125.00
8. Motion to Cite in Additional Party 126.00

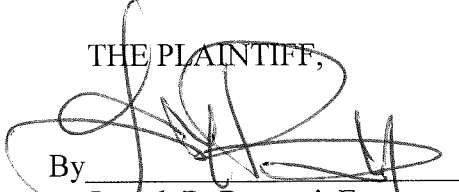
6. ESTIMATED LENGTH OF TRIAL:

It is estimated 2 – 3 days for jury selection and 2 – 3 days for evidence.

7. EXPECTED SCHEDULING PROBLEMS:

None

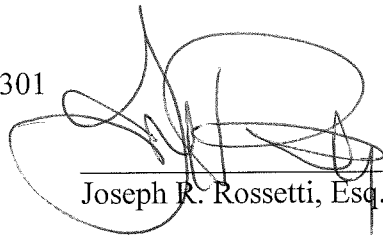
THE PARTIES RESERVE THE RIGHT TO SUPPLEMENT THIS LIST AS NECESSARY

THE PLAINTIFF,

By _____
Joseph R. Rossetti, Esq.
Moore, O'Brien & Foti

CERTIFICATION

I certify that a copy of this document was mailed or delivered electronically or non-electronically on **June 30, 2016** to all attorneys and self-represented parties of record and to all parties who have not appeared in this matter and that written consent for electronic delivery was received from all attorneys and self-represented parties receiving electronic delivery.

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